

RULE 1144 LUBRICANTS, METAL WORKING FLUIDS AND RUST INHIBITORS

(a) Purpose

The purpose of Rule 1144 is to reduce volatile organic compound (VOC) emissions from the use of lubricants, metal working fluids and rust inhibitors at industrial facilities.

(b) Applicability

The rule applies to all persons who use lubricants, metal working fluids and rust inhibitors during the manufacture and assembly of products and parts; and all lubricant, metal working fluid and rust inhibitor manufacturers and suppliers who supply, sell, or offer for sale lubricant, metal working fluids and rust inhibitors for use at industrial facilities. This rule shall apply to all VOC containing fluids used for metal working, metal removal or lubricating operations including, but not limited to, broaching, cutting, drilling, drawing, forging, grinding, heading, honing, lapping, milling, quenching, rolling, stamping, tapping, threading, turning and wire drawing. The rule also applies to VOC containing fluids used for rust and corrosion prevention and inhibition during the manufacture and assembly of products and parts.

(c) Definitions

For the purpose of this rule, the following definitions shall apply:

- (1) AIRCRAFT is any machine designed to travel through the air, without leaving the earth's atmosphere, including airplanes, balloons, dirigibles, helicopters and missiles.
- (2) EXEMPT COMPOUND is as defined in Rule 102.
- (3) GRAMS OF VOC PER LITER OF MATERIAL is the weight of VOC per volume of material and can be calculated by the following equation:

Grams of VOC per liter of material =

$$\frac{W_s - W_w - W_{es}}{V_m}$$

Where: W_s = Weight of volatile compounds in grams
 W_w = Weight of water in grams

Wes = Weight of exempt compounds in grams
Vm = Volume of material in liters

- (4) LAPPING is a manufacturing method that employs particles of an abrasive material, suspended in a liquid carrier, between rotating plates.
 - (5) LUBRICANT is a fluid used to reduce heat and friction and to prolong the life of tools and machinery.
 - (6) MANUFACTURING is the use of tools and labor to make things for sale.
 - (7) METAL WORKING FLUID is a fluid used to improve product quality and carry away debris and may consist of straight oils, soluble oils and synthetic and semi-synthetic fluids.
 - (8) RUST INHIBITOR is an inhibitor, preventative or protectant used to prevent the corrosion of metal surfaces.
 - (9) SINKER ELECTRICAL DISCHARGE MACHINING (EDM) is a method of removing material by a series of rapid recurring electric arcing discharges between an electrode and the workpiece, in the presence of an energetic electric field, in an insulating oil.
 - (10) SPACECRAFT is a vehicle designed to travel one hundred miles above the earth's surface.
 - (11) SPINDLE OIL is a lubricant or metal working fluid for cam-type or enclosed automatic machines including single and multi-spindle turning machines.
 - (12) SOLICIT is to require for use or to specify, by written or oral contract.
 - (13) VOLATILE ORGANIC COMPOUND (VOC) is as defined in Rule 102.
- (d) Requirements
- (1) VOC Content
A person shall not use or solicit the use of any lubricant, metal working fluid or rust inhibitor that have a VOC content in excess of the limits contained in Table A of this paragraph:

Table A – Fluid Categories and VOC Limits

FLUID	EFFECTIVE 1/1/2010	EFFECTIVE 1/1/2011	EFFECTIVE 1/1/2012
	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(A) Lubricant	50 (0.42)		
(B) Metal Working Fluid			
(i) General	50 (0.42)		
(ii) Spindle Oil		50 (0.42)	
(C) Rust Inhibitor	200 (1.67)		50 (0.42)

(2) Prohibition of Sale

- (A) No person shall manufacture for use, offer for sale, sell or distribute directly to a person any lubricant, metal working fluid or rust inhibitor for use in the District which, at the time of sale or manufacture, contains more VOC per liter of material after recommended dilution, and the effective date, as listed in Table A.
- (B) The prohibition of sale shall not apply to any manufacturer of lubricant, metal working fluid or rust inhibitor provided that the product was sold to an independent distributor that was informed in writing by the manufacturer about the compliance status of the product with Rule 1144.

(3) Sell-Through Provision

Any lubricant, metal working fluid or rust inhibitor that is manufactured prior to the effective date of the applicable limit, and that has a VOC content above that limit (but not above the limit in effect on the date of manufacture), may be sold, supplied, offered for sale, or applied for up to six months after the specified effective date.

(e) Control Equipment

In lieu of complying with the requirements of subdivision (d), a person may operate an emission control system provided:

- (1) the control device reduces VOC emissions from an emission collection system by at least 95 percent by weight or the output of the air pollution control device is no more than 5 PPM VOC by volume calculated as carbon with no dilution; and
 - (2) the emission collection system has been demonstrated to collect at least 90 percent by weight of the VOC emissions generated by the sources of VOC emission.
- (f) **Administrative Requirements**
 - (1) Containers, for sale or distribution, of any lubricant, metal working fluid or rust inhibitor subject to this rule shall display the maximum VOC content, as supplied, and after any dilution as recommended by the manufacturer.
 - (2) Containers, for sale or distribution, of any lubricant, metal working fluid or rust inhibitor subject to this rule shall display the date of manufacture of the contents or a code indicating the date of manufacture. The manufacturers of such lubricants, metal working fluids or rust inhibitors shall file with the Executive Officer of the District an explanation of each code.
- (g) **Recordkeeping Requirements**
 - (1) Records shall be maintained pursuant to Rule 109 for all applications subject to this rule. Lubricants, metal working fluids and rust inhibitors that contain 50 grams of VOC per liter of material or less shall be considered Super Compliant Materials per Rule 109 (b)(6).
 - (2) Any person using an emissions control system as a means of complying with this rule shall maintain daily records of all key system parameters, including hours of operation, temperatures, pressures and flow rates, that are necessary to ensure control efficiency requirements.
 - (3) Manufacturers utilizing the provision of subparagraph (d)(2)(B) shall maintain notification letters for five (5) years, and be made available to the Executive Officer or designee upon request.
- (h) **Test Methods and Procedures**

The following test methods and procedures shall be used to determine compliance with this rule. Other applicable test methods may be used if they are determined

to be equivalent and approved in writing by the Executive Officer, the California Air Resources Board and the U.S. Environmental Protection Agency.

- (1) Determination of VOC Content
District Method 313L – Determination of Volatile Organic Compounds by Gas Chromatography/Flame Ionization Detection.
- (2) Determination of Efficiency of Emission Control System
 - (A) The capture efficiency of an emission control system shall be determined by verifying the use of a Permanent Total Enclosure (PTE) and 100% capture efficiency as defined by U.S. EPA Method 204 “Criteria for and Verification of a Permanent or Temporary Total Enclosure.” Alternatively, if a U.S. EPA Method 204 defined PTE is not employed, capture efficiency shall be determined using a minimum of three sampling runs subject to data quality criteria presented in U.S. EPA technical guidance document “Guidelines for Determination Capture Efficiency, January 9, 1995.” Individual capture efficiency test runs subject to the U.S. EPA technical guidelines shall be determined by:
 - (i) The Temporary Total Enclosure (TTE) approach of U.S. EPA Method 204 through 204F; or
 - (ii) The District “Protocol for Determination of Volatile organic Compounds (VOCs) Capture efficiency.”
 - (B) The efficiency of the control device and the VOC content measured and calculated as carbon in the control device exhaust gases shall be determined by U.S. EPA's Test Method 18, or Air Resources Board (ARB) Method 422 for the determination of emissions of Exempt Compounds and U.S. EPA's Test Methods 25, 25A, District Method 25.1 for the determination of Total Gaseous Non-Methane Organic Emissions as Carbon, or District Method 25.3 for the determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources, as applicable.
 - (C) The overall efficiency of an emission control system shall be determined using the following equation:
Overall Efficiency
$$= (\text{Capture Efficiency}) \times (\text{Control Equipment Efficiency})/100$$

(i) Exemptions

- (1) Paragraph (d)(2) and subdivision (f) shall not apply to lubricants, metal working fluids and rust inhibitors subject to the California Air Resources Board consumer products regulation found in Title 17 of the California Code of Regulations, beginning at Section 94507.
- (2) The provisions of this rule shall not apply to lubricants, metal working fluids and rust inhibitors sold in this District for shipment outside of this District or for shipment to other manufacturers for repackaging.
- (3) The provisions of subdivisions (d) and (f) of this rule shall not apply to lubricants, metal working fluids and rust inhibitors subject to VOC limits in other Regulation XI rules.
- (4) The provisions of subdivision (d) shall not apply to the following operations:
 - (A) lapping;
 - (B) sinker EDM;
 - (C) rust inhibitors applied to avionics and after-assembly aircraft;
 - (D) assembled spacecraft components;
 - (E) fluids utilizing the control device option in subdivision (e).